

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b)	
Nancy Isaacson, Esq. (NI/1325) GREENBAUM, ROWE, SMITH & DAVIS LLP 75 Livingston Avenue Roseland, New Jersey 07068 973-577-1930 nisaacson@greenbaumlaw.com Attorneys for Nancy Isaacson, Chapter 7 Trustee	
In re:	
REVIVAL HOLDINGS, LLC,	Chapter 7 Proceeding Case No. 22-19146 (VFP)
Debtor.	
AND	
REVIVAL SASH & DOORS, LLC,	Chapter 7 Proceeding Case No. 22-19151 (VFP)
Debtor.	
AND	
BRIGHT WINDOWS SPECIALTIES, INC,	Chapter 7 Proceeding Case No. 22-19150 (VFP)
Debtor.	
AND	Chapter 7 Proceeding Case No. 22-19147 (VFP)
PRELUDE, LLC d/b/a/ Sequel,	
Debtor	Hearing Date: March 21, 2023 At 10 a.m./p.m.

NOTICE OF MOTION FOR A DECLARATION THAT MENDHAM CAPITAL PARTNERS, LLC AND KEAN DEVELOPMENT COMPANY, INC VIOLATED THE AUTOMATIC STAY AND FOR LEGAL FEES AND COSTS PURSUANT TO 11 U.S.C. §§ 362(a) AND 105(a), AND DISMISSAL OF MENDHAM CAPITAL PARTNERS, LLC'S AND KEAN DEVELOPMENT COMPANY, INC.'S PENDING PROCEEDINGS

TO: ALL PARTIES ON THE ATTACHED SERVICE LIST

SIR/MADAM:

PLEASE TAKE NOTICE that on the 21th day of March 2023 at 10:00 o'clock in the forenoon or as soon thereafter as counsel may be heard, the undersigned, as attorney to the Chapter 7 Trustee, in the captioned matters shall apply to the Honorable Vincent F. Papalia United States Bankruptcy Judge, 50 Walnut Street, Newark, New Jersey, for an order Declaring that Mendham Capital Partners, LLC and Kean Development Company, Inc. Violated the Automatic Stay, and for Legal Fees and Costs Pursuant to 11 U.S.C. §§ 362(a) and 105(a), and Dismissal of Mendham Capital Partners, LLC's and Kean Development Company, Inc.'s Pending Proceedings.

PLEASE TAKE FURTHER NOTICE that in support of the within Motion, the undersigned shall rely upon the within Application and Certification of Nancy Isaacson submitted herewith.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is also submitted herewith.

GREENBAUM, ROWE, SMITH & DAVIS LLP
Attorneys for Chapter 7 Trustee

By: /s/ Nancy Isaacson
Nancy Isaacson

Dated: February 27, 2023

Name and Address of Party Served	Relationship of Party to Case	Mode of Service
Michael Canizales 7150 NE 7th Ave Boca Raton, FL 33487	Defendant	<input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified Mail/RRR Email Notice of Electronic Filing Other: Federal Express As authorized by the court*
Sachs Capital Fund II, LLC 10516 Tulip Lane Potomac, Maryland. 20854	Defendant	<input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified Mail/RRR Email Notice of Electronic Filing Other: Federal Express As authorized by the court*
Sachs Capital Partners, LLC 10516 Tulip Lane Potomac, Maryland 20854	Defendant	<input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified Mail/RRR Email Notice of Electronic Filing Other: Federal Express As authorized by the court*
Andrew Sachs 10516 Tulip Lane Potomac, Maryland 20854	Defendant	<input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified Mail/RRR Email Notice of Electronic Filing Other: Federal Express As authorized by the court*
Robert Henley 1900 Sycamore Spring Court Cooksville, MD 21723	Defendant	<input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified Mail/RRR Email Notice of Electronic Filing Other: Federal Express As authorized by the court*

Peter Manning 68 Sachuest Way Middletown, RI 02842	Defendant	<input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified Mail/RRR Email Notice of Electronic Filing Other: Federal Express <div>As authorized by the court*</div>
Adan P. Wald, Esq. Manny A. Frade, Esq. Meltzer, Lippe, Goldstein & Breitstone, LLP. 190 Willis Avenue, Mineola, New York 11501	Attorneys for Kean Development Company, Inc.	<input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified Mail/RRR Email Notice of Electronic Filing Other: Federal Express <div>As authorized by the court*</div>
Joseph B. Cicero Elliott Covert Thomas A. Youngman Hercules Plaza 1313 North Market Street, Suite 5400 Wilmington, Delaware 19801 (302) 295-0191	Attorneys for Mendham Capital Partners, LLC.	<input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified Mail/RRR Email Notice of Electronic Filing Other: Federal Express <div>As authorized by the court*</div>
Joshua D. Glatter Chipman Brown Cicero & Cole, LLP 501 Fifth Avenue, 15 th Flr New York NY 10017	Attorneys for Mendham Capital Partners, LLC.	<input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified Mail/RRR Email Notice of Electronic Filing Other: Federal Express <div>As authorized by the court*</div>

Name and Address of Party Served	Relationship of Party to Case	Mode of Service
Office of the United States Trustee US Department of Justice One Newark Center, Ste. 2100 Newark, NJ 07102	US Trustee	<input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified Mail/RRR <input type="checkbox"/> Email <input checked="" type="checkbox"/> Notice of Electronic Filing <input type="checkbox"/> Other: _____ As authorized by the court*
Michael Dal Lago, Esq. Dal Lago Law 999 Vanderbilt Beach Road Ste. 200 Naples, Florida 34018	Attorney for Debtor	<input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified Mail/RRR Email <input checked="" type="checkbox"/> Notice of Electronic Filing <input type="checkbox"/> Other: _____ As authorized by the court*

